

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

AVR GROUP, LLC; TRIDENT ASSET MANAGEMENT, INC.; and MICHAEL DZIURGOT, individually and on behalf of a putative class,

Plaintiffs,

vs.

ALEBRIJE ENTERTAINMENT, LLC;
CRAIG COLE; MATTHEW COLE;
GUSTAVO MONTAUDON; and JOHN DOE NOS. 1–10,

Defendants.

Case No. 1:24-cv-20755

DEFENDANT CRAIG COLE'S CERTIFICATE OF INTERESTED PERSONS AND DISCLOSURE STATEMENT¹

Defendant Craig Cole, pursuant to Federal Rule of Civil Procedure 7.1, hereby files this Certificate of Interested Parties and Disclosure Statement.

I. INTERESTED PARTIES

The name of each person, attorney, association of persons, firm, law firm, partnership, and corporation that has or may have an interest in the outcome of this action — including subsidiaries, conglomerates, affiliates, parent corporations, and other identifiable legal entities related to any party in the case:

¹ Defendant Craig Cole files this certificate and statement as directed by the Court, but does so without intending to waive or forfeit his Rule 12 defenses, including that this Court lacks personal jurisdiction over him.

Craig Cole
Resident of Oregon
c/o Stumphauzer Kolaya Nadler & Sloman, PLLC
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Defendant

Stumphauzer Kolaya Nadler & Sloman, PLLC
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Counsel for Defendant Craig Cole

Ryan K. Stumphauzer
Stumphauzer Kolaya Nadler & Sloman, PLLC
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Counsel for Defendant Craig Cole

Francis D. Murray
Stumphauzer Kolaya Nadler & Sloman, PLLC
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Counsel for Defendant Craig Cole

Amy M. Bowers
Stumphauzer Kolaya Nadler & Sloman, PLLC
2 South Biscayne Blvd, Suite 1600
Miami, FL 33131
Counsel for Defendant Craig Cole

Matthew Cole
Resident of Idaho
c/o Stearns Weaver Miller Weissler Alhadoff & Sitterson, P.A.
150 West Flagler St., Suite 2200
Miami, FL 33130
Defendant

Stearns Weaver Miller Weissler Alhadoff & Sitterson, P.A.
150 West Flagler St., Suite 2200
Miami, FL 33130
Counsel for Defendant Matthew Cole

Christopher R. Clark
Stearns Weaver Miller Weissler Alhadoff & Sitterson, P.A.
150 West Flagler St., Suite 2200

Miami, FL 33130

Attorney for Defendant Matthew Cole

Michael J. Harwin

Stearns Weaver Miller Weissler Alhadoff & Sitterson, P.A.

150 West Flagler St., Suite 2200

Miami, FL 33130

Attorney for Defendant Matthew Cole

AVR Group, LLC

c/o LOFTUS & EISENBERG, LTD.

161 Clark, Suite 1600

Chicago, Illinois 60601

Plaintiff

Trident Asset Management, INC.

c/o LOFTUS & EISENBERG, LTD.

162 Clark, Suite 1600

Chicago, Illinois 60601

Plaintiff

Michael Dziurgot

c/o LOFTUS & EISENBERG, LTD.

163 Clark, Suite 1600

Chicago, Illinois 60601

Plaintiff

LOFTUS & EISENBERG, LTD.

161 N. Clark, Suite 1600

Chicago, Illinois 60601

Counsel for Plaintiffs

Joseph McNulty

c/o LOFTUS & EISENBERG, LTD.

164 Clark, Suite 1600

Chicago, Illinois 60601

Owner of AVR GROUP, LLC, TRIDENT ASSET MANAGEMENT, INC

Alebrije Entertainment, LLC

c/o Law Office of Adam I. Skolnik, P.A.

1761 West Hillsboro Blvd., Suite 207 Deerfield Beach, FL 33442

Defendant

Gustavo Montaudon

c/o Law Office of Adam I. Skolnik, P.A. 1761

West Hillsboro Blvd., Suite 207 Deerfield Beach, FL 33442
Defendant

Adam I. Skolnick
1761 West Hillsboro Blvd., Suite 207 Deerfield Beach, FL 33442
Counsel for Defendant Gustavo Montaudon & Alebrije Entertainment, LLC

Law Office of Adam I. Skolnik, P.A.
1761 West Hillsboro Blvd., Suite 207 Deerfield Beach, FL 33442
Counsel for Defendant Gustavo Montaudon & Alebrije Entertainment, LLC

Michele Vives, Esq.
Court Appointed Receiver of 1inMM Capital, LLC
Katten Muchin Rosenman, LLP
525 W. Monroe St.
Chicago, IL
(312) 902-5200

II. RULE 7.1 DISCLOSURE STATEMENT

Defendant Craig Cole is a resident of Oregon and, as an individual, is not subject to corporate disclosure requirements.

Dated: May 22, 2024

Respectfully submitted,

**STUMPHAUZER KOLAYA
NADLER & SLOMAN, PLLC**
2 S. Biscayne Boulevard, Suite 1600
Miami, Florida 33131
Tel.: (305) 614-1400

By: /s/ Francis D. Murray
Francis D. Murray (FBN: 108567)
Ryan K. Stumphauzer (FBN: 12176)
Amy M. Bowers (FBN: 105755)

Email: fmurray@sknlaw.com
rstumphauzer@sknlaw.com
abowers@sknlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on May 22, 2024, I electronically filed the foregoing document with the clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Francis D. Murray
FRANCIS D. MURRAY